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#### 1. PURPOSE AND SCOPE

To define the responsibilities and actions required to administer and conduct readiness reviews in support of determining and verifying the operational status of facilities, programs or processes under the waste acceptance High-Level Waste (HLW) Program. Readiness reviews are not intended to be tools of line management to confirm readiness. Rather, the readiness reviews provide an independent review of readiness to restart or startup operations.

Once work is in progress, surveillances are performed to verify the quality of work in progress, identify conditions adverse to quality, and verify the timely implementation, adequacy, and effectiveness of corrective action. This procedure provides instructions for administering and conducting surveillances of activities performed by the waste acceptance High-Level Waste (HLW) organization. The instructions include preparation, conduct, follow-up, and closure of surveillances.

### 2. REFERENCES

- a. DOE/RW-0333P, Office of Civilian Radioactive Waste Management (RW), Quality Assurance Requirements and Description (QARD)
- b. SPP 3.02, Qualification and Certification Requirements
- c. SPP 4.01, Evaluation & Assessment Activities
- d. SPP 5.01, Deviations and Corrective Actions/Tracking System
- e. SPP 7.01, Quality Records

#### 3. GENERAL

#### a. Discussion

Readiness reviews are performed to satisfy the requirements of DOE/RW-0333P, and may be part of a broader scope review such as an Operations Readiness Review (ORR) or Readiness Assessment. The headquarters HLW personnel conduct readiness reviews of selected activities conducted by the Operations and Project Offices for significant transitional events in the Waste Acceptance Process.

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READINESS REVIEWS AND

SURVEILLANCES

Readiness Reviews verify that:

(1) Work prerequisites have been satisfied;

- (2) Personnel have been suitably trained and qualified; and
- (3) Detailed implementing documents and management controls are available.

As part of the overall evaluation and verification effort, surveillance activities are performed to provide monitoring or observation of work, subject to the QARD, that ensures that items, activities, or processes conform to specified requirements.

External organizations such as the Office of Civilian Radioactive Waste Management (RW), the Nuclear Regulatory Commission (NRC), and the affected states and counties may choose to observe surveillances conducted in accordance with this procedure. They may observe the pre-surveillance or post-surveillance meetings, if held, or the actual conduct of the surveillance, but do not take an active role in the surveillance process. An "Observer Inquiry" form (Attachment A) may be used to address questions, observations, or recommendations during the surveillance. Responses will be provided for each Observer Inquiry form received.

#### b. Definitions

See SPP Glossary of Terms and Acronyms.

#### 4. PROCEDURE

# a. Initiating a Readiness Review

<u>Performer</u> <u>Action</u>

PM (1) Determines need for a readiness review.

- (2) Determines, as applicable, the approval level for the charter, plan, report, and authorization to proceed.
- (3) When directed by the plan, selects or recommends personnel for the Readiness Review Team, including a Team Leader.
- (4) Provides overall direction for the conduct of the readiness review.

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<u>Performer</u> <u>Action</u>

<u>Note</u>: In the case of ORRs, the ORR Team Leader provides overall direction.

(5) Serves as the primary contact between the responsible/ initiating EM organization and other supporting EM organizations regarding document preparation and readiness determinations.

HLW QAPM (6) Reviews the readiness review plan or charter for incorporation of applicable quality assurance requirements.

(7) Reviews and concurs with readiness review documents.

(8) Submits readiness review documents to the appropriate approval authority.

PM (9) Distributes the readiness review document.

#### b. Conducting the Readiness Review

<u>Performer</u> <u>Action</u>

Readiness Review Team

Office Director

- (1) Conducts the readiness review based on the readiness review documents.
- (2) Documents evaluation results, findings, and applicable information in accordance with the plan or the applicable SPPs.

(3) Arranges for a closeout meeting with DOE Headquarters, DOE Operations Office, and the M&O/M&I management, as appropriate.

Readiness Review Team Leader

PM

(4) Conducts a closeout meeting with DOE HQ, DOE Operations and M&O/M&I Contractor, as appropriate.

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## READINESS REVIEWS AND SURVEILLANCES

### c. Processing of Readiness Review Results

<u>Performer</u>	<u>Action</u>
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PM

- (1) Receives notification from the Operations Office that required activities have been completed.
- (2) Arranges for review, verification, and acceptance of completed activities.
- (3) If applicable, prepares correspondence for authorization to proceed.
- (4) Submits authorization correspondence to the Director and HLW QAPM.

**HLW QAPM** 

(5) Reviews and concurs with authorization to proceed.

Office Director

(6) If applicable, reviews and recommends approval for authorization to proceed.

#### d. Records

#### Performer Action

**HLW QAPM** 

- (1) Ensures that the following are submitted as lifetime records for processing into the central records facility in accordance with SPP 7.01 (applicable only if readiness review performed by DOE Headquarters):.
  - (a) Readiness Review Documents;
  - (b) Team Resumes;
  - (c) Final Report;
  - (d) Correspondence appointing Readiness Review Team Members;
  - (e) Report(s) of verification and acceptance of completed findings; and
  - (f) Authorization to proceed.

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#### e. Preparing for Surveillance Activities

### <u>Performer</u> <u>Action</u>

PM/HLW QAPM

(1) Notifies the organization to be evaluated of the planned surveillances.

<u>Note</u>: This may be by memo or the issuance of the Evaluation and Assessment Schedule per SPP 4.01.

(2) Assigns a Surveillance Team Leader (STL) that is knowledgeable about, and not directly responsible for the activity/work under surveillance.

STL

- (3) Selects surveillance team members who are knowledgeable about, but who are not directly responsible for the activity/work under surveillance.
- (4) Identifies and obtains the documents appropriate to the assigned surveillance.
- (5) Initiates a Surveillance Report form (Attachment B) by completing the required information listed in parts A & B to identify the scope of the surveillance. The following information is included:
  - (a) The surveillance type to be performed, i.e., monitoring, observation, review, follow-up of deficiencies identified in previous evaluation and assessment activities. The Commitment Tracking System Report should be reviewed to identify the status of previous deficiencies that may require follow-up.

<u>Note</u>: Checklists may be used at the discretion of the STL.

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## READINESS REVIEWS AND SURVEILLANCES

#### f. Conducting a Surveillance

<u>Performer</u> <u>Action</u>

Surveillance Team Members

- (1) Evaluate activities by:
  - (a) Reviewing organization plans and schedules, progress and status reports, correspondence, quality requirements documents, deviation and occurrence reports, inspection and test reports, procurement documents, open item reports, trend reports, and personnel training and certification documentation to determine if activities conform with requirements.
  - (b) Observing on-going waste acceptance activities to verify they are being performed in accordance with specified requirements.

STL

- (2) Upon completion of surveillance activities, receives input from the surveillance team members and evaluates the results to be reported.
- (3) Notifies the affected organization of any deficiencies.

#### g. Reporting Results of Surveillances

<u>Performer</u> <u>Action</u>

STL

(1) Documents the results of the surveillance on the Surveillance Report (Attachment B) initiated during the surveillance preparation phase.

Note: Surveillance reports should be prepared and issued within 30 working days of completion.

The report will include as appropriate:

- (a) The acceptability of the activity or item.
- (b) The adequacy of the quality assurance practices observed.

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#### **Performer**

#### **Action**

- (c) Deficiencies identified during the surveillance.
- (d) Summary of any immediate corrective action corrective action taken.
- (e) The need for additional evaluations of the activity or program, to follow-up on verification of corrective action.
- (f) The effectiveness of the implementation of the controlling documents.
- (2) Documents conditions adverse to quality on a Deviation and Corrective Action Report (DCAR) in accordance with SPP 5.01.
- (3) Identifies the persons contacted during the surveillance.
- (4) Identifies any measuring and test equipment used.
- (5) Signs Surveillance Report.
- (6) Approves and signs the Surveillance Report, and prepares transmittal letter.
- (7) For external surveillances the transmittal letter will require the evaluated organization to respond to any DCARs within a specified time, identification of the responsible individual, and a proposed corrective action completion date.
- (8) For internal surveillances the transmittal letter will identify a respondent for DCARs, and a due date for the response(s).

PM

(9) Reviews and concurs in Surveillance Report for external surveillances.

**HLW QAPM** 

(10) Signs transmittal letter and issues the Surveillance Report to management of the organization evaluated, with copy to each surveillance team member, and the responsible PM.

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### h. Follow-up and Closeout

## <u>Performer</u> Action

PM/HLW QAPM

- (1) Assigns reviewer(s) to evaluate the responses to the DCARs in accordance with SPP 5.01.
- (2) Ensures that follow-up is conducted to evaluate status and progress of required corrective action to effective closeout.

<u>Note</u>: Follow-up verification and closeout may be accomplished by documentation review, surveillance, or subsequent audit.

- (3) Assembles back-up and closeout documents.
- (4) Prepares and issues correspondence for internal and external surveillances, notifying the evaluated organization that the surveillance is closed after all DCARs are closed.

<u>Note</u>: DCARs can be closed independent of surveillance report.

#### i. Records

### <u>Performer</u> <u>Action</u>

**HLW QAPM** 

(1) Processes the following nonpermanent quality records into the central records facility in accordance with SPP 7.01:

- (a) Surveillance Notification Letter, if applicable.
- (b) Documentation of Surveillance Team Assignment.
- (c) Transmittal Letter with Surveillance Report(s) and supporting documents.
- (d) Completed Observer Inquiry Form
- (e) Post Surveillance Correspondence.
- (f) Closed DCARs.

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<u>Performer</u> <u>Action</u>

<u>Note</u>: Closed DCARs may be transmitted to the central records facility prior to full closure of the Surveillance Report.

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(g) Closure Memorandum.

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SURVEILLANCES

## 5. ATTACHMENTS

Attachment A – Observer Inquiry

Attachment B – Surveillance Report

## 6. REVISION HISTORY

Revision	<b>Description</b>	<b>Effective Date</b>
0	New Procedure	3/24/97
1	Removed QAPD reference; revised approval section per new EM organization; electronic reformatting; addressed internal audit 00-EA-IN-AU-01 issues regarding clarification of "Performers;" minor editorial revisions. As this is a major revision, change bars are not retained, in accordance with SPP 2.01, paragraph 4.d.(1).(b).	5/8/00
2	Replaced "quality records system," which isn't defined in the Glossary, with "central records facility" at sections 4.d.(1), 4.i.(1), and 4.i.(1).(f). Replaced "Office of River Protection" with "River Protection Office" QAPM approval at section 7. Clarified section 4.g.(1), "45 days," to "30 working days." Minor format change in section 7. Revised "staff" to "personnel" in 3.a. Deleted last sentence of 3.a, 1 <sup>st</sup> paragraph.	See SPP Index

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## 7. CONCURRENCE AND APPROVAL

For Kenneth Picha Office of Technical Program Integration Office of Integration and Disposition	12/21/00 Date	
Mark E. Rawlings Ohio Office Office of Site Closure	12/21/00 Date	
Savannah River Office Office of Project Completion	12/21/2000 Date	
Thoms Willy left River Protection Office Office of Project Completion	12   19   00 Date	Rev 2
Quality Assurance Program Manager	12/22/00 Date	Rev 2

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## ATTACHMENT A

## **OBSERVER INQUIRY (EXAMPLE)**

OBSERVER INQUIRY			
Evaluation Number:	Date:		
Observer Name:	Organization:		
Requirement Reference:			
Question/Concern:			
Response:			
Audit/Surveillance Team Member assigned to evaluate:			
Audit/Surveillance Team Leader:			

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## ATTACHMENT B

## SURVEILLANCE REPORT FORM (EXAMPLE)

SURVEILLANCE REPORT			
A. Organization Evaluated	Number		
Surveillance Type	Location		
Surveillance Team	Requirement Document(s)		
B. Scope (Characteristics or attributes to be evaluated)			
C. Results: (Results of Surveillance including persons contacted)			
D. DCAR:			
Surveillance Team Leader	Date		
HLW QA Program Manager	Date		
Program Manager (external only)	Date		